

February 28, 2022

Via ECF

The Honorable Madeline Cox Arleo The Honorable Leda Dunn Wettre United States District Court District of New Jersey 50 Walnut Street Newark, NJ 07101

> RE: Zhao et al. v. Volkswagen Group of America, Inc., et al., Case No. 2:21-cv-11251-MCA-LDW

Dear Judge Arleo and Judge Wettre:

In response to a question posed during the recent telephonic conference, and with the utmost respect to Your Honors, the parties respectfully do not consent to the jurisdiction of the Magistrate Judge to decide the pending motion for preliminary approval of the proposed class action settlement in this matter (ECF No. 25). The parties appreciate and thank the Court for its offer and time.

Dated: February 28, 2022

By: /s/Matthew D. Schelkopf Matthew D. Schelkopf Joseph B. Kenney SAUDER SCHELKOPF

> 1109 Lancaster Avenue Berwyn, PA 19312 Telephone: (610) 200-0581 mds@sstriallawyers.com

Bonner Walsh (pro hac vice)

WALSH PLLC 1561 Long Haul Road Grangeville, ID 83530 Telephone: (541) 359-2827 bonner@walshpllc.com

Attorneys for Plaintiffs and the putative Class

Respectfully submitted,

By: <u>/s/Michael B. Gallub</u>
Michael B. Gallub (pro hac vice)
HERZFELD & RUBIN, LLC

125 Broad Street New York, NY 10004 Telephone: (212) 471-8536 mgallub@herzfeld-rubin.com

Attorneys for Volkswagen Group of America, Inc., sued herein as Volkswagen Group of America, Inc., a New Jersey Corporation, d/b/a Volkswagen of America, Inc. and Audi of America, Inc.